If, for some reason, projected relief is later than the projected 90% fill date, then conservation procedures will be implemented.

This agreement will be included in the resolution statement for Issue #1101. In addition, it was agreed to add the following sentence to the resolution statement to clearly define the SNAC responsibility in this area:

SNAC will work issues related to SMS/800 readiness based on the no more than 90% fill planned relief date.

25. The following statement was agreed to for inclusion in the "Status History" section of Issue 1101:

It was agreed to bring this issue to Initial Closure.

Points Noted:

- 11. It was noted that GTE objects to Agreement Reached 25 due to the aribrary nature of the 90% figure used. In response, it was suggested that the date at which the resource is projected to be at 90% fill should be the date exhaust relief is available.
- 12. It was suggested that there is a need for a process for industry notification of network and SMS readiness and to define monitoring responsibilities, trigger identification mechanisms and clarification of who's responsible for what. In response it was noted that Agreement Reached #22 requests that INC develop this criteria.

Agreement Reached:

26. Given the items in Agreements Reached 24 and 25 and the previous point noted, Issue 1101 was accepted for Initial Closure.

Action Item Response Re: Letter to NANPA

Linda reviewed a draft letter to NANPA regarding the unused/spare 800 NXX currently set aside for the countries served by the 809 area code.

Agreement Reached:

27. Following modifications, the text of the letter appearing as Attachment 8, was agreed to. It will be signed by the INC/SNAC Co-Chairs, Linda Opacic and Craig Wiseman.

(Responses should be returned to SNAC secretary)

LEC "888 Portability" Implementation Plan

Points Noted:

1. It was suggested that the document made available earlier, entitled "The LEC "888 Portability" Network Implementation Plan" does not include any references to 00Y codes for 888, and they will be needed.

Action Item:

11. Maureen Fiorelli, Bellcore, will investigate the concerns related to 00Y codes and 888.

Points Noted:

 During notes review, it was noted that the team authoring the document is addressing the 00Y concerns now and it was suggested that updates will be distributed via the CLC 888 Steering Committee.

Action Item Response Re: NOF Liaison

Craig reviewed a draft liaison letter to NOF regarding the 250 test codes in 800 and 888 and 800 911.

Agreement Reached:

28. The draft letter to the NOF was modified and agreed to as it appears in Attachment 9. This letter will also be signed by the INC/SNAC Co-Chairs, Linda and Craig.

Points Noted:

1. It was noted that an issue(s) have been introduced to NOF in the past regarding potential reclamation of 800 250. The issue(s) were not accepted by NOF in the past.

OBF Issue 1102 (INC Issue #049) 800 Number Administration Guidelines Changes

Craig briefly reviewed OBF Issue 1102 (INC Issue #049), 800 Number Administration Guidelines Changes, and noted that related discussion is expected to include proposed changes to "Industry Guidelines for 800 Number Administration"

Points Noted:

- 1. Craig noted that many guidelines changes have been discussed throughout this meeting as well, and that these may need to be incorporated into the guidelines.
- 2. Denny Byrne, USTA, reviewed a USTA contribution on Issue 1102 (see Attachment 10). At the outset, Denny noted that a traditional audit process (i.e., determining whether a number is being appropriately used) was not being suggested by the USTA contribution.
- 3. Denny suggested that it needs to be determined if the current guidelines are doing what was intended, given the volume of usage of the 800 resource.
- 4. It was suggested that a task force may need to be created to address this issue.
- 5. It was suggested that it needs to be determined whether this is a guidelines problem or a true growth problem by both INC and SNAC.
- 6. It was suggested that the USTA proposal is more of a "planning" one than an "auditing" one.
- 7. Concerns were expressed over the growth in numbers, the growth in usage and the seriousness of looking at reclaiming any number which may have little usage.
- 8. It was suggested that focusing on auditing is a waste of energy, based on historical data.
- 9. It was suggested that the turnover process of numbers, as established by the guidelines, may be flawed, and it needs to be determined.
- 10. It was suggested that future growth needs to be gauged and sufficient resources set aside in advance.
- 11. It was suggested that marketing studies are not appropriate, but industry forecasts could be used.
- 12. It was suggested that, as a result of the last meeting, all companies are doing what they can, and further supervision of 800 number usage is not necessary.
- 13. It was suggested that analysis or auditing of 10 digit numbers should be done in SNAC, whereas NPAs should be addressed at INC.
- 14. It was suggested that there is no problem, and monitoring of 800 resource usage is already happening in the individual companies, and it is a process internal to the companies.

- 15. It was suggested that if data is going to be used by the INC/SNAC, it should be aggregated data.
- 16. It was suggested that reclamation of unused 800 numbers be discussed and what those procedures might be for the 800 resource.
- 17. It was suggested that CIC was different than 800 reclamation because there was a condition for retention of CICs—which was usage. The only condition on having an 800 number today is that the customer pay pursuant to the tariffed rate.
- 18. A question was raised as to what exactly will be "audited" under the USTA contribution, and the term "audit" may be a misnomer.
- 19. It was suggested that since 800 is a tariff service, it cannot be denied to customers based on it being unused.
- 20. It was suggested that Issue 1102 is broader than just reclamation, and more time should be spent discussing the problem and other possible alternatives.
- 21. It was suggested that "unused" does not include low-usage or assigned numbers not often utilized but paid for.
- 22. It was suggested that the data USTA proposes for its contribution would include percentage of working numbers with low usage in order to determine future needs, not asking RESP ORGs how many customers they have.
- 23. It was suggested that it needs to be determined why usage has gone up since portability and how that affects or could be applied to conservation with regard to future use of resources (e.g., 888 service).
- 24. It was suggested further that USTA needs the following usage information: what numbers are being used in order to warrant building/expanding the network.
- 25. It was suggested that the INC/SNAC is not a forecasting group.
- 26. It was suggested that causes need to be determined in order to prevent exhaust in the future, and forecasting needs to be done.
- 27. It was suggested that the discussion sounds like a marketing forecast and that is not the job of an industry forum.

- 28. It was suggested that the current guidelines are based on an honor system, and that the only controls being suggested are the ensure that :
 - 1. a customer name exists in the SMS, and that
 - 2 the customer pays tariff rate for the service

and that these two things should be "audited". "Audited" simply is checking whether the controls available are working adequately to ensure the resource is being wisely used.

- 29. It was suggested that the data needed (i.e., working numbers) is all that is needed to predict exhaust, and that is already being provided by DSMI.
- 30. It was suggested that whether the tariff rate is being paid may not be voluntarily provided.
- 31. It was suggested that as long as the customer pays for the service, the INC/SNAC should not be looking at the categorization of industry segments, that is whether e.g., the paging industry has a certain percentage of usage.
- 32. In response to a question as to why 800 usage has grown so drastically, it was suggested that the residential market is growing and that portability has effected levels of usage because it permits numbers to be assigned which may not actually be active used.
- 33. It was suggested that if a number is assigned it is used.
- 34. It was suggested that if a working number has a name assigned to it and the tariff rate is being paid, then the audit process may be in place already.
- 35. It was suggested that Section 2.2.5 of the SMS Guidelines addresses Point Noted 34, as well as the proposal for a definition of "unused" from the last meeting.
 - 2.2.5 Reservation, Assignment or Activation (Working) of 800 Numbers may only be made by a RESP ORG based upon negotiations with a specific prospective Customer. When the RESP ORG learns of the Customer decision not to utilize the Reserved or Assigned 800 Number, the RESP ORG must release the 800 Number back to Spare status and the pool of numbers available for assignment within 48 hours of Customer Notification...
- 36. GTE indicated is supports reclamation of unused numbers.
- 37. It was suggested that DSMI status terminology be used in determining the definition of "unused".
- 38. It was suggested that DSMI terminology should not be used.

- 39. It was suggested that there are unused numbers in other categories besides SPARE and UNAVAILABLE.
- 40. It was suggested that "used" be defined, and everything else be considered unused, and that "used" is a number ordered and paid for.
- 41. It was suggested that "used" is one that is not SPARE and not AVAILABLE according to the Guidelines.
- Seeking clarification of whether or not we are working the USTA contribution. Craig stated that we are not—currently, we are trying to define "used" or "unused" as it is raised by Issue 1102.
- 43. It was suggested that an approach to resolving the definition of "unused" would be to assume one definition or the other simply for purposes of reaching agreement.
- 44. It was suggested by MCI that the 4 month voluntary reservation change was in the right direction to return unused numbers to the resource pool, and if there is a suggestion being made that there is some issue of abuse of the guidelines, it should be brought to the FCC's attention, not addressed by INC/SNAC. AT&T noted support for the MCI point.
- 45. It was suggested that the industry follows the guidelines and returns unused numbers, and if this is not the case in someone's perception, the CRTC or FCC is the place to address those concerns.
- 46. It was suggested the current guidelines provide adequate category classification (e.g., SPARE, ASSIGNED, etc.) and unless an actual, detailed audit process is actually presented to the INC/SNAC for its review and consideration, there is nothing further to be discussed.
- 47. It was suggested that today there are no formal guidelines controls that actually provide a check on whether there is a valid customer name and "tariff rate being paid" verification. The guidelines should include such controls to specify that all RESP ORGs do a yearly check to this effect to ensure that there is a valid working number so that if there were to be an audit, there would be a record of what has been done.
- 48. It was suggested that this is done informally now.
- 49. It was suggested that perhaps it is warranted to consider defining "unused" in the Guidelines.
- 50. It was suggested that, if there were an audit, more than just "unused" would be investigated (i.e., valid customer name and tariff payment verification).

- It was suggested that an audit would also look at numbers in "DISCONNECT" for over 1 year.
- 52. It was asked if there is an industry need to modify the guidelines to include reclamation of numbers and/or definitions for "used" and "unused".

Agreement Reached:

29. It was agreed to modify the guidelines to include resource reclamation.

Points Noted:

- 53. It was proposed that each RESP ORG will develop internal processes for reclamation auditing to ensure proper categorization, and it would be updated annually and be voluntarily implemented.
- 54. It was suggested that reclamation be incorporated into the RESP ORG responsibility list.
- 55. It was suggested that, assuming a task force, the related documentation should be publicly reviewed at some point.

Agreement Reached:

30. It was agreed in concept that the guidelines include text related to individual RESP ORG validation of the quantity of 800/888 in each SMS category on an annual basis. (It is expected that the text will be developed by a yet to be formed editorial subgroup.)

Points Noted:

56. It was suggested that a Bell Atlantic contribution at INC regarding a change in the guidelines be worked by a subgroup including the co-chairs and:

Jonnie Bond, AT&T Susie Cotter, Sprint Ken Culpepper, BellSouth Charlotte Herzberger, GTE Denis Brouzes, Bell Sygma

- 57. AT&T suggested that the proposed guidelines changes should be ready for review at the next meeting of OBF SNAC. If this is accepted, it was suggested that this is solely a SNAC issue.
- 58. It was suggested that the SNAC work the guidelines changes and forward results to INC.

59. It was suggested that there be INC involvement in the editorial subgroup.

Agreement Reached:

31. It was agreed that an editorial subgroup will meet via conference call at 3:15 p.m. EDT Tuesday, May 2, 1995. The call in number is 1-800-988-9479 (access code 7522).

Points Noted:

- 60. It was noted that although secretarial support will not be provided for the conference call, there needs to be rapid turn-around of results.
- 61. The issue status report was updated.
- 62. It was noted that the INC/SNAC group will remain intact until this issue closes.
- 63. It was noted that 888 NXXs is not in the purview of INC and that conservation will not apply at the onset of 888 unless it opens at 90% fill.
- 64. It was suggested an issue be submitted in SNAC regarding opening 888.
- 65. It was suggested that the Y factor action item from the last meeting needs to be discussed.
- 66. Concerns were expressed as to how to make it an aggregate figure.
- 67. It was noted that the proposed ARINC issue will be worked at SNAC, depending on ARINC representation. It was expressed by SMT that this is a vital concern to 888 implementation.
- 68. It was suggested that RESP ORGs could call DSMI offline to give them an indication of the Y-factor.

Action Item:

12. All RESP ORGs will resolve previous action items regarding the Y factor and report to DSMI.

Points Noted:

69. It was suggested that some of the Issue 1100 resolutions would apply when not in conservation mode.

- 70. In response, it was suggested that specific incorporation into the existing guidelines was not decided upon.
- 71. MCI believes INC/SNAC may be missing an opportunity with the ARINC issue, and it should be acted on by the FCC at INC/SNAC request. Further, the CLC meeting next week should address it. MCI does not believe the forums can resolve the issue.
- 72. The committee supports the MCI view that regulatory guidance is needed.
- 73. It was suggested that from an advertising standpoint, the Y-factor is vital.
- 74. It was noted that the ARINC concern may have significant impact on 888 implementation.
- 75. It was suggested that the INC/SNAC recognized that it cannot address the issue, and it should be referred to the CLC for their consideration and possible referral the FCC.
- 76. It was suggested that the FCC will only act on a petition received by a specific company(ies) requesting action in the form of a petition that serves notice.
- 77. It was noted that the issues was received at INC, but is only a topic of discussion at INC/SNAC.

Agreement Reached:

- 32. It was agreed that the ARINC issue cannot be resolved by INC/SNAC regarding matching 888 assignment, and will refer it to the CLC for possible communication to the FCC.
 - In notes review, it was noted that the INC/SNAC will notify Ben Levitan of ARINC of this Agreement Reached via a call from Craig.
- 33. It was agreed that there is interest to establish a group or have this group (INC/SNAC) look at long-term serving arrangement issues for called party paid services. USTA will champion this issue.

Points Noted:

- 78. It was noted that CRTC is the equivalent to the FCC for Canada, and the CRTC will have to make equal decisions regarding 800 services.
- 79. It was suggested that remaining future INC/SNAC issues can be handled via conference call.